

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION

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UNITED STATES OF AMERICA,

CR 1:16-cr-00184

Plaintiff,

vs.

DEFENDANT'S SENTENCING  
MEMORANDUM

WILLIAM ANTHONY FLY,

Defendant.

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Comes Now the Defendant, William Anthony Fly, by and through her attorney, Christopher P. Bellmore, Assistant Federal Public Defender, and hereby submits the following memorandum in anticipation of the sentencing hearing presently set for February 26, 2018.

Fly asserts that the base offense level of 14 under USSG § 2G1.1(a)(2) is appropriate. Aside from acceptance of responsibility, there are no other applicable adjustments. This results in a total offense level of 12. Fly's criminal history category is II based on three calculable points resulting from one prior conviction. As such, Fly's sentencing guideline range is 12-18 months and falls within Zone C. Fly was arrested on July 15, 2016. DCD 5; PSIR, page 1. At the time of sentencing, Fly will have been incarcerated for 592 days or 19 months and 12 days.

Fly therefore recommends a sentence within the applicable sentencing guideline range as described above. Fly asserts that such a sentence would be

sufficient but not greater than necessary upon consideration of the factors set forth in 18 U.S.C. § 3553(a).

Dated this 19th day of February, 2018.

Respectfully submitted,

NEIL FULTON  
Federal Public Defender  
By:

/s/ Christopher P. Bellmore

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